

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

UBER TECHNOLOGIES, INC.,

Plaintiff,

v.

WINGATE, RUSSOTTI, SHAPIRO, MOSES  
& HALPERIN, LLP, JAY WECHSLER,  
BANILOV & ASSOCIATES, P.C., NICK  
BANILOV, THE LAW OFFICE OF  
DOMINICK W. LAVELLE d/b/a LAVELLE  
LAW FIRM, EMILY K. LAVELLE,  
MICHAEL GERLING, GERLING  
INSTITUTE, LEONID REYFMAN, AND  
PAIN PHYSICIANS NY PLLC,

Defendants.

Case No. 25-cv-00522-OEM-VMS

**JOINT STIPULATION EXTENDING PLAINTIFF'S  
TIME TO FILE AMENDED COMPLAINT**

**WHEREAS**, Uber Technologies, Inc. (“Uber”) filed its Complaint in this matter on January 30, 2025 (ECF No. 1);

**WHEREAS**, Defendants Wingate, Russotti, Shapiro, Moses & Halperin, LLP, Jay Wechsler, Banilov & Associates, P.C., Nick Banilov, The Law Office of Dominick W. Lavelle d/b/a Lavelle Law Firm, Emily K. Lavelle, Michael Gerling, Gerling Institute, Leonid Reyfman, and Pain Physicians NY PLLC (together, “Defendants”) served motions to dismiss on June 23, 2025 (*see* ECF Nos. 63, 64, 65 and 66);

**WHEREAS**, Federal Rule of Civil Procedure 15(a)(1)(B) permits Uber to amend its Complaint within 21 days of service of Defendants’ motions to dismiss under Rule 12(b); and

**WHEREAS**, Defendants have each consented in writing to extend Uber's deadline to amend its Complaint from July 14, 2025 to July 23, 2025;

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned counsel for the parties that Uber may file an Amended Complaint on or before July 23, 2025.

Dated: July 11, 2025

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